

HMK/mjg CH 7967

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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FEDERAL INSURANCE COMPANY,  
A/S/O ROCKWELL FREIGHT  
FORWARDING, LLC and  
UNIFOLD CORPORATION,

Plaintiff,

08 CV 0221 (JFK)(FM)  
ECF CASE

-against-

JASMIN INTERNATIONAL CORP.

**COMPLAINT**

Defendants.

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Plaintiff through its attorneys KINGSLEY, KINGSLEY & CALKINS allege for  
their complaint herein:

1. This is a claim arising under the Court's Federal question jurisdiction with  
respect to the interstate carriage of goods by surface motor common carrier, pursuant to  
28 U.S.C. §1331, and under the Interstate Commerce Act and 49 U.S.C. §14706.

2. Plaintiff is the owner or duly authorized representative of the owner or  
underwriters or subrogated underwriters of a cargo of paperboard in new good order  
and condition shipped from Fairfield, New Jersey to Baldwinsville, New York on or  
about April 13, 2007, on board defendant's truck and other conveyances, and for which  
bill of lading 7761 was issued by or on behalf of defendant.

3. Defendants are the motor common carriers, freight forwarders, brokers,  
operators, terminal operators, common carriers by air and by land, and bailees for hire

with respect to the cargo described above which was carried and kept aboard the defendant's inland conveyances, terminals and warehouses by defendants.

4. The cargo described above was lost and damaged by defendants due to the fault, neglect, deviation, tort, tortious interference with contract, breach of warranty and contract, statutory violations, salvage expenses, and conversion of defendants, their agents and servants, and delivered by defendants in non-conforming condition, mis-delivered and non-delivered.

5. Plaintiff sues on its own behalf and as agent and trustee on behalf of any other party who may now have or hereinafter acquire an interest in this action.

6. Plaintiff's damages are in excess of \$32,787.00.

WHEREFORE, plaintiff demands judgment in an amount exceeding \$32,787.00.

Dated: January 10, 2008

KINGSLEY, KINGSLEY & CALKINS  
Attorneys for Plaintiff

BY: \_\_\_/S/\_\_\_\_\_  
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